

**REMARKS**

Claims 1-12 and 14-20 are pending. By this Amendment, claims 1-12, 14 and 17-20 are amended, and claim 13 is canceled. The independent claims have been amended to even more clearly distinguish over the applied references. The feature that the stage apparatus is part of an exposure apparatus, previously recited in claim 13, has been placed into independent claim 1. The claims dependent from claim 1 have been amended to be consistent with amended claim 1. In addition, the independent claims have been amended to clarify that the lyophilic portion is disposed lower than an upper surface of the substrate held by the holder in a vicinity of the holder radially outward of an outer circumferential part of the substrate held by the holder, and that the lyophilic portion faces downward. Such amendments are supported in Applicants' original specification. See, for example, surface 5 in Fig. 4 and the corresponding description. Thus, no new matter is added by the above amendments.

**I. Information Disclosure Statement**

The Examiner is requested to consider the information cited in the Information Disclosure Statement that was filed on August 15, 2008.

**II. All Pending Claims Are Patentable**

Claims 1-5, 8-13, 17 and 18 stand rejected under 35 U.S.C. §102(e) over Garcia et al. (U.S. Patent No. 6,988,327). The rejection is respectfully traversed.

Garcia et al. does not disclose each and every feature of independent claim 1. Garcia et al. does not disclose an exposure apparatus having a projection optical system by which an image of a pattern is projected onto an upper surface of a substrate. Garcia et al. discloses a device for cleaning (washing) wafers after the wafer has been polished. Accordingly, Garcia et al. does not anticipate independent claim 1, and it would not have been obvious to modify the cleaning device of Garcia et al. to have a projection optical system. Accordingly,

independent claim 1, along with the claims that depend from claim 1, are patentable over Garcia et al. Withdrawal of the rejection is requested.

Claims 6 and 7 stand rejected under 35 U.S.C. §103(a) over Garcia et al. in view of Lof et al. (US 2004/0160582). The rejection is respectfully traversed.

Lof et al. does not overcome the deficiencies in Garcia et al. noted above with respect to independent claim 1 in that it would not have been obvious to modify the Garcia et al. cleaning device to have a projection optical system. Accordingly, claims 6 and 7 also are patentable. Withdrawal of the rejection is respectfully requested.

Claims 1, 2, 4, 6, 7, 9 and 11-20 stand rejected under 35 U.S.C. §103(a) over Lof et al. in view of Hayashi et al. (US 2001/0035897). The rejection is respectfully traversed.

Applicants respectfully submit that it would not have been obvious to modify Lof et al. in the manner proposed in the Office Action in order to result in the combinations of features recited in independent claims 1 and 14. First, even if Lof et al. and Hayashi et al. are combined, the resulting exposure apparatus stage would not have a lyophilic portion disposed radially outward of the outer circumferential part of the substrate held by the holder, and being lower than an upper surface of the held substrate and facing downward. Second, the Office Action's proposed modification of Lof et al. in view of Hayashi et al. is untenable.

In particular, the Office Action's assertion that it would have been obvious in view of Hayashi et al. to "coat the surface of the atmosphere 65 of Lof hydrophilic" is unreasonable. First, it is impossible to "coat the atmosphere." The Office Action refers to item 65 (which is the atmosphere) of Lof et al. as numerous things including "portion", "recovery device" and "atmosphere." However, only "atmosphere" is correct, and as mentioned above, it is impossible to "coat " the atmosphere. Thus, the Office Action's proposed modification is untenable.

Furthermore, because the goal of Lof et al. is to prevent liquid from entering the vacuum system of pimple table 20, one skilled in the art would be led away from making anything in the vicinity of the opening communicating with atmosphere 65 of Lof et al. lyophilic because that would attract liquid toward the pimple table 20. Thus, the Office Action's proposed modification of Lof et al. is contrary to the teachings of Lof et al. because Lof et al. explicitly discloses making layer 60 hydrophobic.

Furthermore, the portion of Lof et al. (atmosphere 65) that the Office Action proposes to make lyophilic is not disposed "radially outward of the outer circumferential part of the substrate held by the holder" and is not "facing downward."

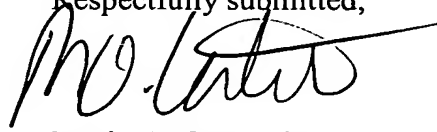
Accordingly, independent claims 1 and 14, along with all of their dependent claims, are patentable over Lof et al. and Hayashi et al. Withdrawal of the rejection is respectfully requested.

### **III. Conclusion**

In view of the foregoing, Applicants respectfully submit that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe anything further would be desirable to place this application in even better condition for allowance, the Examiner is invited to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,



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Attachment:  
Request for Continued Examination

Date: October 21, 2008

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